

Monsanto

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LAW DEPARTMENT

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

January 20, 1995

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Carol Graszer-Ropski
Emergency Support Section
United States Environmental
Protection Agency (HSE-5J)
77 West Jackson Boulevard
Chicago, IL 60604

RE: General Notice of Potential Liability and Request for
Information Sauget Area II, Site Q (Formerly Known as the
Sauget & Company Landfill, Sauget, Illinois)

Dear Ms. Ropski:

Monsanto Company (Monsanto) hereby responds to the United States Environmental Protection Agency (EPA) Request for Information pursuant to Section 104(e) of CERCLA for the Sauget Area II, Site Q, dated December 16, 1994. Monsanto received the Information Request on December 19, 1994 and by telephone conversation with your office on January 9, 1995, received an extension of time in which to respond up to January 20, 1995.

In response to the EPA's Request for Information, Monsanto disagrees with the EPA's overly broad assumption of authority which it asserts is conferred by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) 42 USC Section 9601, et seq. Monsanto also objects to the overly broad scope of the questions included within the EPA's Request for Information and to the unreasonable time period which is not specified in the Information Request. Other and further objections and claims of privilege, both general and specific, are noted in Monsanto's responses to the specific requests.

However, consistent with Monsanto's policy of cooperation with government agencies, Monsanto is responding to the non-objectionable, non-privileged portions of EPA's Request for Information. At the same time, Monsanto reserves all objections and defenses as to EPA's statement of authority and the scope of information as requested.

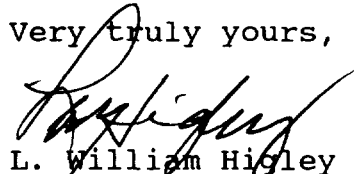
Ms. Carol Graszer-Ropski
January 20, 1995
Page 2

Monsanto's Response is submitted herewith, attached and marked as "Exhibit A." Other exhibits are referenced therein and also attached. Monsanto hereby asserts a claim of business confidentiality as to the information contained in all documents and exhibits submitted herewith pursuant to 40 CFR Part 2, subpart B. Where appropriate, the cover sheets to the information are marked in accordance with 40 CFR section 2.203(b).

Given the extensive scope of information as requested, and given the effort required to review and make diligent search for responsive information, Monsanto reserves the right to amend and/or to supplement this response as appropriate in the future upon the discovery of further documents and information. Specifically, it must be noted that Monsanto's responses herein do not attempt to duplicate the information supplied in the documentation which has been previously produced by Monsanto for EPA's inspection from certain litigations styled Cerro Copper Products Company vs. Monsanto Company and Monsanto Chemical Company, Number 92-CV-204-WDS (USDC SD IL).

Please direct all further inquiries, or questions concerning Monsanto's position in this matter or any information submitted herewith to the undersigned counsel at (314)694-8503.

Very truly yours,



L. William Higley
Assistant Environmental Counsel

LWH/sqf/253

Monsanto's Response to Request for Information
Concerning Sauget Area 2, Site Q, Sauget, Illinois

GENERAL OBJECTIONS

Monsanto generally objects to the overly broad, unauthorized and unduly burdensome nature of the questions included in the December, 16, 1994 Request for Information on the site referenced above, as propounded by the United States Environmental Protection Agency (EPA). Monsanto objects to the extreme breadth of information sought insofar as the questions fail to limit the scope of inquiry to the transport, storage, treatment or disposal of hazardous substances, as defined in 42 US Code section 9601(14) (hazardous substance), at or to the Sauget area to Site Q in Sauget, Illinois. The questions as propounded are in excess of EPA's authority for purposes of information requests under CERCLA Section 104(e) concerning a hazardous waste site. Furthermore, there is no showing that the individual propounding these requests on behalf of EPA possesses the requisite authority to make such requests pursuant to CERCLA. Monsanto also objects to the definitions and instructions included in the Request for Information on the grounds that they exceed the scope of EPA's authority for purposes of such an Information Request.

Given the undefined unlimited periods of time for which inquiry is made, the undefined nature of questions and the existence of multiple lawsuits which may pertain to some aspects of the questions as propounded (including but not limited to People of the State of Illinois vs. Monsanto Company, No. 82-CH-195, 20th Judicial Circuit, St. Clair County Illinois; Cerro Copper Products Company vs. Monsanto Company and Monsanto Chemical Company, No. 92-CV-204-WDS, (USDC SD IL); and, Monsanto Company vs. the Aetna Casualty & Surety Company, et al., C.A. No. 88C-JA-118-1-CV, Superior Court, New Castle County, Delaware), various communications and documents are not subject to disclosure on the basis of irrelevance, over broadness, lack of competent authority, attorney-client communications, attorney work product, self-critical analysis and/or settlement negotiations.

Monsanto states that the objections set forth above are continuing in nature, and to the extent applicable, shall be deemed included in each and every answer given below, whether or not specifically set forth therein. Monsanto specifically reserves to itself and does not waive the right to raise additional objections as appropriate at any later time.

RESPONSES

1. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

Response 1:

Monsanto objects to Request Number 1 on the grounds that it exceeds the EPA's authority to propound Information Requests under Section 104(e) of CERCLA inasmuch as it is unreasonably burdensome and over broad by virtue of not being limited to periods of time or place of origin. Subject to the foregoing objection, however, Monsanto answers that it is reviewing voluminous documentation pertaining to the operating records of its facilities in the metropolitan area and, as of this submission, has not located documents which are responsive to this question. Such review of documentation, and further inquiry, is continuing, and Monsanto reserves the right to supplement this answer at such future time as it may discover documents or other information which is responsive to this question. To the extent that certain facts may be matters of common knowledge it is impossible to identify everyone who may have any knowledge of a fact.

To the extent that other persons may be able to provide a more detailed or complete response to a particular Information Request or may be able to provide additional responsive documents, such persons are identified in the documents which are provided or referenced herein, specifically Exhibits B and C which are attached hereto.

2. Did you ever use, purchase, store, treat, dispose, transport, or otherwise handle any hazardous substances or materials at or to the Site?

Response 2:

Monsanto objects to Request Number 2 on the grounds that it exceeds the EPA's authority to propound Information Requests under Section 104(e) of CERCLA inasmuch as it is unreasonably burdensome and over broad by virtue of not being limited to periods of time or place of origin. Subject to the foregoing objection, however, Monsanto answers that it is reviewing voluminous documentation pertaining to the operating records of its facilities in the metropolitan area and, as of this submission, has not located documents which are responsive to this question. Such review of documentation, and further inquiry, is continuing, and Monsanto reserves the right to

supplement this answer at such future time as it may discover documents or other information which is responsive to this question. To the extent that certain facts may be matters of common knowledge it is impossible to identify everyone who may have any knowledge of a fact.

3. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. In addition, identify the following:

- a) The persons with whom you or such other persons made such arrangements;
- b) Every date on which such arrangements took place;
- c) For each transaction, the nature of the waste material or hazardous substance, including the chemical content, characteristics, physical state (e.g. solid, liquid), and the process for which the substance was used or the process which generated the substance;
- d) The owner of the waste materials or hazardous substances so accepted or transported;
- e) The quantity of the waste materials or hazardous substances involved (weight or volume) in each transaction and the total quantity for all transactions;
- f) All tests, analyses, and analytical results concerning the waste materials;
- g) The person(s) who selected the Site as the place to which the waste materials or hazardous substances were to be transported;
- h) The amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;
- i) Where the person identified in g., above, intended to have such hazardous substances or waste materials transported and all evidence of this intent;
- j) Whether the waste materials or hazardous substances involved in each transaction were transshipped through, or were stored or held at, any intermediate site prior to final treatment or disposal;

- k) What was actually done to the waste materials or hazardous substances once they were brought to the Site;
- l) The final disposition of each of the waste materials or hazardous substances involved in such transactions;
- m) The measures taken by you to determine the actual methods, means, and site of treatment or disposal of the waste material and hazardous substances involved in each transaction;
- n) The type and number of containers in which the waste materials or hazardous substances were contained when they were accepted for transport, and subsequently until they were deposited at the Site, and all markings on such containers;
- o) The price paid for (i) transport or (ii) disposal or (iii) both, of each waste material and hazardous substance;
- p) All documents containing information responsive to a)-o) above, or in lieu of identification of all relevant documents, provide copies of all such documents; and
- q) All persons with knowledge, information, or documents responsive to a)-o) above.

Response 3:

Monsanto objects to Request Number 3 on the grounds that it exceeds the EPA's authority for Information Requests under Section 104(e) of CERCLA on the basis that it is unreasonably burdensome and over broad inasmuch as no period of time or limitation as to place of origin is specified. In addition, the inquiry is so hopelessly complicated by virtue of the addition of multiple subparts as to be incapable of response. Subject, however, to the foregoing objection, Monsanto states that it has commenced a review of voluminous documentation pertaining to a lengthy history of operation but that, at the present time, has not identified documents or other information which are responsive to the inquiry. Such review and investigation is continuing, however, and Monsanto reserves the right to supplement this response with further documentation or other information when it becomes known. Further, Monsanto objects on the basis that this inquiry requests information which is or may be the subject of common knowledge of a great number of individuals, all of whom are impossible of identification. As of the date of this response, Monsanto is unaware of the

identification of individuals having knowledge or information separate and apart from those identified in Exhibit B, attached hereto, and documentation which is being reviewed.

4. Have you or any other person working with you or on your behalf ever accepted waste materials for transportation to the Site from any person? If the answer to this question is anything but an unequivocal no, identify:

- a) The persons from whom you or such other persons accepted waste materials for transport to the Site;
- b) Every date on which waste materials were so accepted or transported;
- c) For each transaction, the nature of the waste materials accepted or transported, including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the material was used or the process which generated the material;
- d) For each material, describe any warnings given to you with respect to its handling;
- e) The owner of the materials so accepted or transported;
- f) The quantity of the material involved (weight or volume) in each transaction and the total quantity for all transactions;
- g) All tests or analyses and analytical results concerning each material; and
- h) The price charged for transport and/or disposal per drum, barrel, container, or load (or whatever unit used) of waste materials brought to the Site.

Response 4:

Monsanto objects to Request Number 4 on the grounds that it exceeds the authority of the EPA to request information under Section 104(e) of CERCLA and on the ground that it is unreasonably broad and over burdensome by virtue of its not being limited as to period of time or place of origin. Further, Request Number 4 is ambiguous inasmuch as it appears to be a restatement of the subject matter of Request Number 3. Specifically, a number of the multiple subparts of Request Number 4 appear to closely parallel the subject matters of the subparts of Request Number 3. Accordingly, Monsanto restates and incorporates herein by reference its objections and response to

Request Number 3 as if the same had been more fully restated and set forth herein. Monsanto further states that its review and investigation of documents and information which may be responsive to this inquiry is continuing and Monsanto reserves the right to supplement this answer with such other and further documents and/or information as and when it becomes available.

5. Identify all liability insurance policies held by Respondent from 1955 to the present which relate to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

Response 5:

Monsanto objects to Request Number 5 insofar as it is overly broad and exceeds the EPA's authority for the purposes of an Information Request propounded under the purported authority of Section 104(e) of CERCLA. Monsanto had, and does have, various insurance policies which were in effect during various periods of time. Monsanto notes that no period of time is specified in the Information Request. The issue of whether or not any such insurance policies relate to Site Q in Area II is itself related to issues which are currently involved in litigation. See Monsanto Company vs. the Aetna Casualty & Surety Company, et al., C.A. No. 88C-JA-118-1-CV, Superior Court, New Castle County, Delaware.

6. Identify the acts or omissions of any persons, other than your employees, contractors, or agents, that may have caused the release or threat of release of hazardous substances, pollutants, or contaminants and damages resulting therefrom.

Response 6:

Monsanto objects to Request Number 6 insofar as it is unreasonably broad and exceeds the EPA's authority for the purposes of an Information Request submitted or propounded under Section 104(e) of CERCLA. Specifically, Request Number 6 is not limited as to a period of time or place or location, and is not, on its face, pertinent to Area 2, Site Q. Further, request 6 calls for a legal conclusion in its Request for Information regarding "damages" resulting from any release or threat of release of hazardous substances, pollutants or contaminants.

7. Has the Respondent submitted information to other federal, state or local regulatory agencies, including but not limited to the Illinois Pollution Control Agency, Illinois Environmental Protection Agency, U.S. Department of Labor, or U.S. Department of Transportation either verbally or in writing, concerning its disposal or treatment or arrangement for transportation for disposal or treatment of waste materials, including hazardous substances, at the Site or to the Site. If yes, describe what was requested, what was provided, when information was given, and to whom it was given. If written documentation was given please provide a copy of that information in your response to this request.

Response 7:

Monsanto objects to Request Number 7 on the grounds that it is overly broad and exceeds the EPA's authority for purposes of submission of an Information Request under Section 104(e) of CERCLA. For purposes of providing this response, Monsanto understands Request Number 7 to be limited to information related to Area II, Site Q.

On October 24, 1989, Monsanto submitted a response to the Illinois Environmental Protection Agency's (IEPA) Requests for Information dated August 7, 1989 with respect to sites located in what has been identified as Area I and Area II. A copy of Monsanto's response dated October 24, 1989, is attached hereto and marked "Exhibit C." At this time, Monsanto is assembling and copying those documents submitted as appendices to the said response of October 24, 1989, which pertain to Area II, Site Q, and will submit copies of such documents upon completion of such collection and copying. Inasmuch as such information submission may have been accompanied by telephone communication between persons unknown, it is impossible to reproduce what communication may have taken place. However, Monsanto believes that such responses were accurate and complete as submitted.

8. According to a letter addressed to Riverport Terminal & Fleeting Company, dated June 30, 1980, during the week of May 26, 1980, a Pillsbury contractor ruptured a barrel containing a chemical substance on the Site. This container was identified as belonging to Monsanto and copies of a Monsanto internal memorandum reflected that C.F. Buckley prepared a report which was distributed to D.T. Mayer and a copy to M. Dimmitt at the Pillsbury Co. Answer the following questions pertaining to this "incident":

- a) Completely describe the incident, including but not limited to the following: dates of the incident; time; precise location (including place and depth); the names

of the bulldozer drivers and other contractor employees on site at the time the incident occurred; the number and types of containers exposed or found; the markings on the containers exposed or found; the persons and companies notified of the incident; the date and time of notification; the actions of Respondent's and other person(s) or companies in response to the incident; the date, time, and method of disposal of the containers; the date, time and results of any testing of the containers; the person(s) and companies responsible for arranging for the disposal; the person(s) and companies responsible for the actual disposal of the container(s); what legal action including any settlements, lease payment abatements or any other agreements resulting from this incident; whether any other containers were exposed during this or the completion of this project; and, when, if ever, work was resumed on the Site.

- b) On a copy of the attached map, please identify where the container was found:
- c) Please identify the contractor and all contractor and Respondent employees (including names, addresses, telephone numbers, and titles then and now) directly or indirectly involved in this incident, including but not limited to C.F. Buckley and D.T. Mayer.
- d) If the construction work was being done under the supervision of an engineering department or company, please identify the project engineer, including the name, telephone number, company, address, and position title, and provide copies of the overall engineering drawing for this project.
- e) Please identify and provide copies of all communications and records of communication with all other parties, its employees, agents and representatives, or insurance companies concerning this incident, including but not limited to Paul Sauget, Sauget and Co., Pillsbury Company, and any and all owners, operators, lessees or the assigns of the property.
- f) Please state what substances were contained in the container(s);
- g) Describe whether Respondent has found other containers or barrels on the Site. If yes, please answer questions 7(a) through 7(f) for each incident.

Response 8:

Monsanto objects to Request Number 8 on the grounds that it is vague and indefinite as stated. No copy of any such letter and/or memorandum was enclosed with the Information Request. It is therefore impossible for Monsanto to determine what documents are being referred to. Monsanto has submitted a request under the Freedom of Information Act for all information in the EPA's possession showing or tending to show any connection between Monsanto and Area II, Site Q. Monsanto specifically renews said request with respect to the letter and memorandum referenced in Request Number 8. Upon being granted the opportunity to inspect such material, Monsanto may be able to make further response. Meanwhile, Monsanto is investigating this matter as best it can internally and will furnish such further and other information as it discovers, immediately its discovery.

9. Please identify the unions representing the following types of Monsanto employees who work within a 50 mile radius of Site Q; truck drivers; over-the-road drivers; heavy equipment operators; bulldozer operators; tanker truck operators; vacuum truck operators; and, semi-trailer drivers. For each union identified, please identify the current business agent and provide the agent's name and address.

Response 9:

Monsanto objects to Request Number 9 on the grounds that it exceeds the EPA's authority to request information under Section 104(e) of CERCLA, specifically, on the grounds that it is not limited as to period of time of any such employment. Subject to the foregoing objection, however, Monsanto states that it has no employees in any of the specified categories at its Queeny Plant, 1700 South Second Street, St. Louis, Missouri, 63104. At its W.G. Krummrich Plant, 500 Monsanto Avenue, Sauget, Illinois, Monsanto employees who perform any of the listed tasks are represented by local 12, International Chemical Workers Union, the office of which is at the W. G. Krummrich Plant. The president of the local is Mr. Edward McCormick, (618)482-6348. Information as to Monsanto's Carondelet Plant, 8201 Idaho Avenue, St. Louis, Missouri, 63111, will be submitted as soon as it becomes known.

Exhibit A

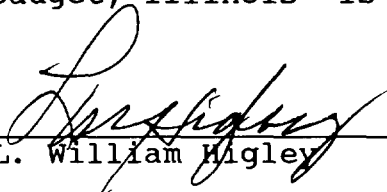
CONFIDENTIAL BUSINESS INFORMATION

Pursuant to 40CFR Part 2, Subpart B, Monsanto Company hereby asserts a claim of Confidential Business Information as to this exhibit and all documents and attachments thereto.

VERIFICATION

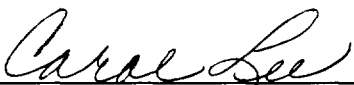
STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS) ss.

L. William Higley, being duly sworn, deposes and says that he has read the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area II, Site Q, Sauget, Illinois" and is familiar with the contents thereof; that the deponent is without personal knowledge of the matters stated in the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area II, Site Q, Sauget, Illinois"; that the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area II, Site Q, Sauget, Illinois" has been assembled by authorized employees and counsel of Monsanto Company who have informed deponent that the foregoing "Monsanto's Response to Request for Information Concerning Sauget Area II, Site Q, Sauget, Illinois" is true; and that to the best of deponent's knowledge this "Monsanto's Response to Request for Information Concerning Sauget Area II, Site Q, Sauget, Illinois" is true.



L. William Higley

Subscribed and sworn to before me
this 20th day of January, 1995.



Notary Public in and for said
County and State

CAROL LEE
Notary Public — Notary Seal
STATE OF MISSOURI
JEFFERSON COUNTY
My Commission Expires: February 23, 1997

Monsanto EXHIBIT C

LAW DEPARTMENT

Monsanto Company
800 N. Lindbergh Boulevard
St. Louis, Missouri 63167
Phone: (314) 694-1000

October 24, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Child, Manager
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
P.O. Box 19276
Springfield, IL 62794-9276

Re: L1630200005 -- St. Clair County
Request For Information;
Sauget Sites -- Area 1 and Area 2

Dear Mr. Child:

This letter is a timely response to the Environmental Protection Agency's (IEPA) letters dated August 7, 1989, on the subject sites referenced above. Monsanto Company responds consistent with the extension of time, to October 24, 1989, that was granted by the Office of the Illinois Attorney General.

Monsanto is submitting one response which will address matters raised in the IEPA letters for Area 1 and Area 2. In response to those letters, we disagree with the IEPA's overly broad assumption of authority which it asserts is conferred by the Comprehensive Environmental Response Compensation and Liability Act (CERCLA), 42 USC §9601 et. seq., and the Resource Conservation and Recovery Act (RCRA), 42 USC §6901 et. seq. Furthermore, the IEPA does not furnish sufficient data to support the factual assertions which it sets forth in its letters. We also object to the overly broad scope of certain questions and the far-reaching time period (1930 through the present) included in the IEPA information request. However, consistent with Monsanto's policy for cooperation with government agencies, we are responding to your request, but at the same time are not waiving any objections to the IEPA's authority, the factual assertions included in the IEPA's letter, or the scope of information requested. By this submission of information responsive to the overly broad requests, we do not admit any question of fact or law. Certain information provided are responses to Congressman Eckert's survey

of the chemical industry in 1979. The questionnaires were sent to 50 chemical companies and asked the companies to provide information by estimating (undefined) the volumes of wastes, the method of disposal, and further requiring companies to speculate on the facility at which disposal may have occurred.

Monsanto has conducted a diligent search for information responsive to the request for information at the W.G. Krummrich Plant, Sauget, Illinois; the J.F. Queeny Plant, St. Louis, Missouri; the Carondelet Plant, St. Louis, Missouri; and investigations by personnel at the Monsanto Company Corporate Headquarters in St. Louis, Missouri. I, N. Cornell Boggs, III, the Monsanto Company attorney assigned to this matter, have reviewed the documents which have been submitted to me by the above-mentioned plants. I am without personal knowledge of the matters stated in the documents submitted in response to the information requests. The documents have been assembled by authorized employees who have informed counsel that they have conducted a search of their respective files, which has resulted in the produced information that follows. To the best of this attorney's knowledge and belief, the information provided is true.

Following the search of plant and corporate files, documents that have been located and responsive to particular information requests have been sub-divided into categories which reflect the particular "Site" within either Area 1 or Area 2 that the document is responsive to. Accordingly, as IEPA reviews each of Monsanto's, the Site-specific answers will reference an alphabetically-sequenced appendix. Each appendix begins with an index listing the responsive documentation. No documentation has been located which supports the position that Monsanto has any waste associated with Area 1. All documentation located for this area are responsive to Information Request (No. 8) wherein Monsanto provides documentation of transactions and/or agreements between Monsanto and "owners" within Area 1 during the period of disposal. At this time, Monsanto does request the IEPA's assistance in providing whatever information the IEPA possesses, or has evaluated which has led the IEPA to include Monsanto as a recipient of the Area 1 Information Request.

It must be understood that Monsanto's ability to respond to the Information Requests for Area 1 and for Area 2 is restricted by the age of the transactions and the breadth of information requested. Monsanto has spent considerable time and resources in order to provide complete responses within the limited time provided.

Monsanto has previously produced numerous documents, relevant to the issue of waste disposal, to the State of Illinois in Illinois v. Monsanto. The following documents are "confidential" pursuant to the protective order entered in the lawsuit at pages K00002-K00004, K02033-K02043, and K02050-K02055. Because of the broader scope of the information requested, we have submitted additional documents which reference documents subject to the protective order. For all of these documents, Monsanto states a

confidentiality claim pursuant to 35 Ill. Adm. Code, Part 161. All documents included in Monsanto's claim of confidentiality are located in Appendix A.

Monsanto's responses to the specific Information Requests are attached. If there are any questions regarding the matters discussed above, please contact the undersigned at (314) 694-6032.

Very truly yours,

N. Cornell Boggs, III

N. Cornell Boggs, III
Environmental Attorney

enc.

cc: Christine Zeman
Assistant Attorney General
Office of the Illinois Attorney General

Answers to Information Requests
Sauget Sites - Area I and Area II

Answer No. 1: No Monsanto Company documents were located which are responsive to Area I or to Sites O and Q in Area II. Documents that are responsive to Site R are located and indexed at Appendix B.

Answer No. 2: No Monsanto Company documents were located which are responsive to Area I or to Sites O and Q in Area II. Documents that are responsive to Site R are located and indexed at Appendix C.

Answer No. 3: No Monsanto Company documents were located which are responsive to Area I as to Sites O and Q in Area II. Documents that are responsive to Site R are located and indexed at Appendix D.

Answer No. 4: No Monsanto Company documents were located which are responsive to Area I or to Area II. Should response documents be found this request for information will be supplemented.

Answer No. 5: No documents were located which are responsive to Area I as to Sites O and Q in Area II. The only responsive document found is relevant to Site R and is located and indexed at Appendix E. This document is also responsive to Question 2.

Answer No. 6: No documents were located which are responsive to Area I or to Site O in Area II. Documents that are responsive to Sites R and Q are located and indexed at Appendix F.

Answer No. 7: Monsanto objects to question No. 7 insofar as it is overly broad and exceeds IEPA's authority for the purposes of a hazardous waste site information request. Monsanto had, and does have, various insurance policies which were in effect during the time periods in question. If Monsanto is ever adjudged responsible for liabilities arising from this matter, Monsanto

and its insurance carriers will determine whether or not specific insurance policies provide coverage for specific occurrences. Monsanto's insurance coverage for environmental claims is presently in litigation. See Monsanto Company v. Aetna Casualty & Surety Company, et al., Delaware Superior Court, Newcastle County, Delaware, CA No. AD8C-JA-118-1-CV and CA No. 9576; Travelers Company v. Monsanto Company, et al., U.S. District Court for the District of Connecticut, CA No. H88-34(AHN).

Answer No. 8: Monsanto Company documents which were located are responsive to Area II, Site O, and to various unknown sites within Area I and Area II. These documents are located and indexed at Appendix G.

Answers to Information Requests
Sauget Sites - Area I and Area II

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and its insurance carriers will determine whether or not specific insurance policies provide coverage for specific occurrences. Monsanto's insurance coverage for environmental claims is presently in litigation. See Monsanto Company v. Aetna Casualty & Surety Company, et al., Delaware Superior Court, Newcastle County, Delaware, CA No. AD8C-JA-118-1-CV and CA No. 9576; Travelers Company v. Monsanto Company, et al., U.S. District Court for the District of Connecticut, CA No. H88-34(AHN).

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